

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**TATIA LIPE,**

**Plaintiff,**

**v.**

**Case No. 1:23-cv-00899-GBW-JMR**

**ALBUQUERQUE PUBLIC SCHOOLS,**

**Defendant.**

**DEFENDANT'S MOTION FOR EXTENSION OF TIME  
TO SUPPLEMENT ITS DISCOVERY RESPONSES TO PLAINTIFFS' DISCOVERY TO  
DEFENDANT ALBUQUERQUE PUBLIC SCHOOLS**

COMES NOW Defendant, Albuquerque Public Schools (APS), by and through its attorneys of record, Cuddy & McCarthy, LLP (M. Karen Kilgore), and hereby requests a 10-day extension of time to respond to provide the supplemental discovery responses required to be provided on October 3, 2025, pursuant to the Court's September 5, 2025 Order Granting in Part and Denying in Part Plaintiff's Two Motions to Compel Discovery. APS counsel has been diligently working on gathering the information; however, due to a tragedy in El Paso, Texas, APS counsel's law clerk working on this matter was called away and the required information and verifications have not been completed. If additional information is required by the Court, Defendant's counsel is able to provide details verbally or in a confidential document.

Therefore, Defendant seeks a 10-day extension of time, or until October 13, 2025, within which to provide the supplemental discovery responses.

Defendant's counsel sought Plaintiff's counsel's concurrence as to this extension; however, Plaintiff opposes the extension of time.

WHEREFORE, Defendant APS requests that the Court permit it to comply with the September 5, 2025 Order by October 13, 2025, and for such other and further relief as the Court deems appropriate.

Submitted:

CUDDY & McCARTHY, LLP

By: *M. Karen Kilgore*  
M. KAREN KILGORE  
Attorneys for Defendant Albuquerque Public  
Schools  
Post Office Box 4160  
Santa Fe, New Mexico 87502-4160  
(505) 988-4476

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed through the CM/ECF system on this 1st day of October, 2025 which will cause service to the following:

Boglarka Foghi, Esq.  
Foghi Law Firm LLC  
Attorney for Plaintiff  
[foghilaw@yahoo.com](mailto:foghilaw@yahoo.com)

*M. Karen Kilgore*  
M. Karen Kilgore